

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

LAWRENCE GEOFFREY ABRAHAM,
ALICE ZHANG, WAYNE TSENG, and
JAMAAL CARNEY, individually and on behalf
of all others similarly situated,

Plaintiffs,

vs.

PEOPLECONNECT, INC., a Delaware
Corporation,

Defendant.

DECLARATION OF ALICE ZHANG

I, Alice Zhang, hereby declare as follows:

1. I am a plaintiff in the above-captioned action. I am currently a resident of California. If called upon to testify, I could and would testify to all facts relevant to this action within my personal knowledge.

2. I attended Albany High School. A photograph of me as a student taken from my high school yearbook is searchable on the website www.classmates.com. Classmates.com uses my name and photograph to advertise paid subscription plans.

3. Classmates never requested my consent to use my name and photograph, and I never provided any consent to Classmates.

4. I am not a subscriber of any Classmates products or services. I do not have an

1 account with Classmates. I have never agreed to a Terms of Service from Classmates.com. To the
2 best of my knowledge and recollection, I have never visited www.classmates.com.

3 5. There is no agreement to arbitrate between myself and Classmates.com. To the
4 extent Classmates.com intends to assert some agreement exists, I expressly repudiated any
5 agreement to arbitrate in the Complaint, and I hereby re-state and re-affirm that repudiation.

6 6. I instructed my attorneys to pursue this case in federal court. I did not authorize my
7 attorneys to agree to arbitration on my behalf.

8 7. I am not aware of any agreements between my counsel and Classmates.com. I am
9 not aware of any accounts on Classmates.com created by my counsel.

10 8. I did not instruct my attorneys to investigate the Classmates.com website on my
11 behalf.

12 9. I am a proposed Class representative in this lawsuit. As a Class representative, I
13 understand I represent a Class of other persons whose names and likenesses also appear on the
14 Classmates.com website without their consent. I understand that I must consider the interests of
15 other Class members in pursuing my claims.

16 10. As part of my duties as a Class representative, I reviewed the First Amended
17 Complaint to ensure the accuracy of the facts as they related to me. I understand that I may need
18 to assist in preparing discovery requests and may need to produce documents and materials. I
19 intend to attend by videoconference the mediation scheduled for August 10, 2022. I understand I
20 may be called to testify in this case at a deposition and/or at trial. I am willing and able to fulfill
21 my duties as Class representative.

22 11. If this case were not certified as a Class action, it would not be feasible for me to
23 pay an attorney to bring an individual lawsuit to pursue my claim.

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2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct to the best of my knowledge.
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5 Executed this 3rd
6 day of August, 2022.

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9 Alice Zhang
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CERTIFICATE OF SERVICE

I, Raina C. Borrelli, hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record via the ECF system.

DATED this 5th day of August, 2022.

By: /s/ Raina C. Borrelli
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